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6 *In Propria Persona*

FILED
CLERK, U.S. DISTRICT COURT
6/30/25
CENTRAL DISTRICT OF CALIFORNIA
BY <u> </u> CS <u> </u> DEPUTY
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7 **UNITED STATES DISTRICT COURT FOR**
8 **THE CENTRAL DISTRICT OF CALIFORNIA**

9 **WESTERN DIVISION**

11 **TODD R. G. HILL, et al.,**

13 **Plaintiffs**

15 **vs.**

17 **THE BOARD OF DIRECTORS,
18 OFFICERS AND AGENTS AND
19 INDIVIDUALS OF THE PEOPLES
20 COLLEGE OF LAW, et al.,**

21 **Defendants.**

12 CIVIL ACTION NO. 2:23-cv-01298-JLS-BFM

13 **The Hon. Josephine L. Staton**
14 Courtroom 8A, 8th Floor

15 **Magistrate Judge Brianna Fuller Mircheff**
16 Courtroom 780, 7th Floor

17 **THIRD NOTICE OF CONSTRUCTIVE
18 DENIAL AND REQUEST FOR
19 CLARIFICATION REGARDING
20 UNRESOLVED FRE 201 JUDICIAL NOTICE
MOTIONS**

21 **NO ORAL ARGUMENT REQUESTED**

23 **THIRD NOTICE OF CONSTRUCTIVE DENIAL AND REQUEST FOR CLARIFICATION REGARDING**
24 **UNRESOLVED FRE 201 JUDICIAL NOTICE MOTIONS**

25 CASE 2:23-CV-01298-JLS-BFM

1 TABLE OF CONTENTS
2

I.	BACKGROUND	3
II.	REQUEST FOR STATUS AND CLARIFICATION	4
III.	PRESERVATION OF RIGHTS AND RECORD	5
IV.	MATERIAL FORECLOSURE OF FAIR ADJUDICATION.....	5
V.	CONCLUSION.....	5
STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1		6
Plaintiff's Proof of Service.....		6

9
10 **Rules**

Fed. R. Civ. P. 15(a)(2).....	4
Fed. R. Civ. P. 54(b)	4
Fed. R. Civ. P. 59(e).....	3
Fed. R. Civ. P. 60(b)	5
FRE 201	3

1 **THIRD NOTICE OF CONSTRUCTIVE DENIAL AND REQUEST FOR CLARIFICATION**
2 **REGARDING UNRESOLVED FRE 201 JUDICIAL NOTICE MOTIONS**

3
4 TO THE HONORABLE COURT AND ALL PARTIES OF RECORD:

5 Plaintiff Todd R. G. Hill respectfully submits this notice to identify and clarify the status of
6 unresolved requests for judicial notice that remain pending before the Court, many of which are
7 directly relevant to both Plaintiff's operative claims and the Fifth Amended Complaint filed on June
8 13, 2025 (Dkt. 310).

9
10 Plaintiff previously filed Docket 326 on June 11, 2025, titled *Second Notice of Constructive*
11 *Denial and Pending Requests for Judicial Notice*, expressly identifying several of these same filings
12 and preserving the procedural position that the omission of a ruling constitutes a constructive denial
13 or de facto ruling, subject to appellate review and reconsideration under Fed. R. Civ. P. 59(e).
14
15

16 **I. BACKGROUND**

17 To date, no express orders resolving these requests have been issued. This current notice is
18 submitted in good faith to reiterate those pending matters and to confirm Plaintiff's intent to preserve
19 a complete and reviewable record.
20

21 As of the date of this filing, the following FRE 201 Requests for Judicial Notice remain
22 pending, without express denial or docketed ruling:
23

- 24 1) Dkt. 276 – Defendant Spiro's Governance Admissions (filed 4/23/2025)
25
26 2) Dkt. 279 – Errata re: Dkt. 272 (filed 4/25/2025)
27
28 3) Dkt. 280 – Opposition to Spiro's RJN + Plaintiff's RJN re: Governance (filed 4/28/2025)
29
30 4) Dkt. 298 – Supplemental RJN in Support of Rule 59(e) Motion (filed 5/9/2025)

31 **THIRD NOTICE OF CONSTRUCTIVE DENIAL AND REQUEST FOR CLARIFICATION REGARDING**
32 **UNRESOLVED FRE 201 JUDICIAL NOTICE MOTIONS**

33 CASE 2:23-CV-01298-JLS-BFM

1 5) Dkt. 301 – Qualified Opposition and Additional RJN (filed 5/11/2025)
2

3 6) Dkt. 326 – Second Notice of Constructive Denial (filed 6/11/2025)
4

5 7) Dkt. 329 – Judicial Admissions in Spiro’s Answer (filed 6/13/2025)
6

7 These filings do not seek substantive relief beyond judicial notice under FRE 201 and have
8 been submitted in a timely and procedurally proper manner. Several of the underlying exhibits were
9 produced by Defendants or obtained via formal CPRA requests and contain factual admissions,
10 regulatory correspondence, and governance representations central to the asserted causes of action.
11

12 **II. REQUEST FOR STATUS AND CLARIFICATION**

13 In light of the pending Rule 15(a)(2) motion and the potential for review under Rule 54(b),
14 Plaintiff respectfully requests clarification as to whether the Court intends to rule on the above-
15 referenced FRE 201 motions, and whether any of them are deemed denied by implication.
16

17 Several of these pending FRE 201 requests contain factual materials previously referenced by
18 the Court, including those acknowledged or discussed in connection with Docket 197 and Docket
19 199.
20

21 The plaintiff respectfully notes that while the Court cited portions of these submissions, such
22 as governance admissions, CPRA-produced correspondence, and procedural irregularities, no formal
23 ruling granting or denying judicial notice of those materials has been entered. In light of the pending
24 Fed. R. Civ. P. 15(a)(2) motion and the potential for review under Fed. R. Civ. P. 54(b), Plaintiff
25 respectfully requests clarification as to whether the Court intends to issue specific dispositive rulings
26 on the above-referenced FRE 201 motions, and whether any of them are deemed denied by
27 implication or omission.
28

THIRD NOTICE OF CONSTRUCTIVE DENIAL AND REQUEST FOR CLARIFICATION REGARDING
UNRESOLVED FRE 201 JUDICIAL NOTICE MOTIONS

CASE 2:23-CV-01298-JLS-BFM

1 **III. PRESERVATION OF RIGHTS AND RECORD**
2

3 For the avoidance of doubt, Plaintiff continues to preserve all appellate rights under Fed. R.
4 Civ. P. 59(e) and Fed. R. Civ. P. 60(b), and submits this notice solely to support an administratively
5 complete and procedurally transparent record.

6 **IV. MATERIAL FORECLOSURE OF FAIR ADJUDICATION**
7

8 Fair adjudication has been materially foreclosed by the Court's ongoing refusal to resolve
9 dispositive and, in many cases, procedurally ripe requests, or to send any signal of procedural
10 integrity, even when fully briefed judicial notice motions and objections have remained pending for
11 months and dispositive rulings have been issued (e.g., Docket 312). This pattern of selective
12 omission, when viewed against dispositive rulings that rely on disputed facts and unaddressed filings,
13 raises a substantial concern regarding procedural parity and the effective administration of justice.
14

15 **V. CONCLUSION**
16

17 Plaintiff submits this notice in good faith to reiterate the pendency of multiple FRE 201
18 judicial notice requests, many of which bear directly on claims asserted in the Fifth Amended
19 Complaint and prior dispositive rulings. In the absence of express rulings or docketed denials, these
20 omissions risk undermining procedural integrity, generating avoidable appellate exposure, and
21 compounding the perception of selective adjudication. Plaintiff respectfully requests clarification
22 from the Court regarding the status of these motions and renews his preservation of all procedural
23 and appellate rights under Rules 59(e), 60(b), and applicable doctrines. A transparent ruling on these
24 requests would materially advance the interests of justice and support the orderly resolution of the
25 claims presented.
26
27

1 Respectfully submitted,
2

3 Dated: June 30, 2025
4

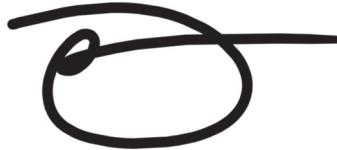


5
6 **Todd R. G. Hill**
7 **Plaintiff, In Propria Persona**
8
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10
11 **STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1**
12

13 The undersigned party certifies that this brief contains 730 words, which complies with the 7,000-
14 word limit of L.R. 11-6.1.
15

16 Respectfully submitted,
17



18 June 30, 2025
19 Todd R.G. Hill
20 Plaintiff, in Propria Persona
21
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23
24

25 **Plaintiff's Proof of Service**
26

27 This section confirms that all necessary documents will be properly served pursuant to L.R. 5-
28 3.2.1 Service. This document will be/has been electronically filed. The electronic filing of a
document causes a "Notice of Electronic Filing" ("NEF") to be automatically generated by the

THIRD NOTICE OF CONSTRUCTIVE DENIAL AND REQUEST FOR CLARIFICATION REGARDING
UNRESOLVED FRE 201 JUDICIAL NOTICE MOTIONS

CASE 2:23-CV-01298-JLS-BFM

1 CM/ECF System and sent by e-mail to: (1) all attorneys who have appeared in the case in this Court
2 and (2) all pro se parties who have been granted leave to file documents electronically in the case
3 pursuant to L.R. 5-4.1.1 or who have appeared in the case and are registered to receive service
4 through the CM/ECF System pursuant to L.R. 5-3.2.2. Unless service is governed by Fed. R. Civ. P.
5 4 or L.R. 79-5.3, service with this electronic NEF will constitute service pursuant to the Federal
6 Rules of Civil Procedure, and the NEF itself will constitute proof of service for individuals so served.
7
8

9
10 Respectfully submitted,

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14 June 30, 2025
15 Todd R.G. Hill
16 Plaintiff, in Propria Persona
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**THIRD NOTICE OF CONSTRUCTIVE DENIAL AND REQUEST FOR CLARIFICATION REGARDING
UNRESOLVED FRE 201 JUDICIAL NOTICE MOTIONS**

CASE 2:23-CV-01298-JLS-BFM